



U.S. Department of Justice

United States Attorney
Southern District of New York

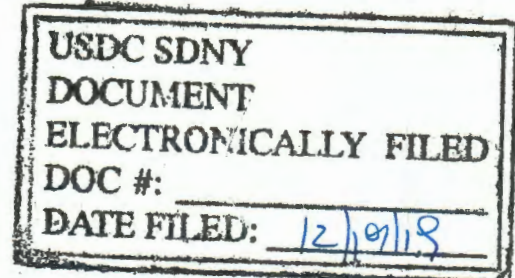
The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

December 6, 2019

BY ECF and EMAIL

Hon. Sidney H. Stein
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED



Re: United States v. Chad Allen, Shane Hanna, and Cameron Brewster,
19 Cr. 833 (SHS)

Dear Judge Stein:

At the bail hearing held in the above-captioned case on December 5, 2019, the Court set conditions for the release of defendants Chad Allen, Shane Hanna, and Cameron Brewster. Certain of these conditions did not appear on the bail disposition sheets prepared by the magistrate clerk's office. The parties therefore respectfully request that the Court so-order the following conditions:

For Chad Allen:

- (1) The defendant is prohibited from dissipating assets in personal or corporate accounts over which the defendant exercises control unless (1) the payment is for legal services in connection with this case, or (2) the sum is less than \$10,000; any disbursement of \$10,000 or more must be cleared in advance by pre-trial services;
- (2) The defendant may not work at the following entities: C Allen Consulting LLC, Choice Business Resources, DTCA Consulting Services, Innovative Management Group, Dakag Holdings, Diamond Consulting Services, Jayco Industries, Safemeds Inc., Hilton Tax, Reliable Business Consultants

For Shane Hanna:

- (1) The defendant is prohibited from dissipating assets in personal or corporate accounts over which the defendant exercises control unless (1) the payment is for legal services in connection with this case, or (2) the sum is less than \$10,000; any disbursement of \$10,000 or more must be cleared in advance by pre-trial services;

- (2) The defendant may not work at the following entities: Ebiz Financial Group, Pinnacle Marketing Group, American Business Builders, UMS Group, Hilton Tax, Reliable Business Consultants

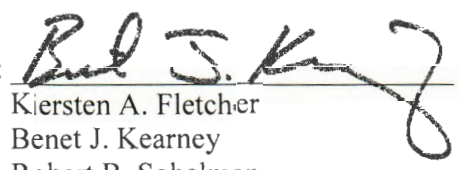
For Cameron Brewster:

- (1) The defendant is prohibited from dissipating assets in personal or corporate accounts over which the defendant exercises control unless (1) the payment is for legal services in connection with this case, or (2) the sum is less than \$10,000; any disbursement of \$10,000 or more must be cleared in advance by pre-trial services;
- (2) The defendant may not work at the following entities: Higher Standards Business, E-Commerce Learning, Money Sucking Website, Dynamic Fulfillment, Ecomm 123, Ecommerce Consulting, Ecommerce Web Development, Elite Mentoring, FO Consulting LLC, Freedom Ecommerce, Indigo Group LLC, Kreative, Omega Mentoring Group, Platinum Institute LLC, Red Steele

Very truly yours,

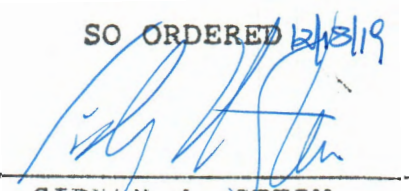
GEOFFREY S. BERMAN
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by:


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cc: Jason Foy, Esq.
Richard Rosenberg, Esq.
Ryan Poscablo, Esq.

SO ORDERED 12/8/19


SIDNEY H. STEIN
U.S.D.J.